

# CLIFTON BUDD & DeMARIA, LLP

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June 16, 2021

**VIA ECF**

Hon. Paul A. Crotty, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Alejandro Huggins v. Jonathan Wiener, et al.*  
SDNY Case No. 1:18-cv-01037 (PAC)

Dear Judge Crotty:

This firm represents the defendants in the above-referenced action. Pursuant to Your  
Honor's Individual Practices, Rules 1.A and 1.E, we write to respectfully request that the  
proceedings in the above-captioned action and any pending deadlines therein be stayed through  
Friday, July 9, 2021.

Ari Weisbrot, of the Law Office of N. Ari Weisbrot LLC, has passed away. Prior to his  
passing, Mr. Weisbrot had served, along with our office, as co-lead counsel for defendants in this  
matter. Defendants seek the requested stay to assess their representation and make appropriate  
arrangements for continuing their defense. We have conferred with counsel for plaintiffs, who do  
not object to this application.

Pursuant to the Case Management Plan and Scheduling Order entered by this Court on  
February 23, 2021, the parties had been due to complete fact discovery no later than Monday,  
June 28, 2021. While both named plaintiffs have been deposed, several depositions remain  
outstanding. Should the stay be granted, Defendants propose that the parties submit a revised  
case management plan proposing a schedule to complete the remaining depositions, to be  
submitted by the conclusion of the proposed stay, no later than Friday, July 9, 2021.

6/17/2021

The request (✓) is granted and

the matter stayed until 7/9/2021

Sounded

Paul A. Crotty  
USJD



**CLIFTON BUDD & DEMARIA, LLP**

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We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for Defendants*

By:   
Stephen P. Pischl

cc: **VIA ECF**  
BERANBAUM MENKEN LLP  
*Attorneys for Plaintiff*

BORRELLI & ASSOCIATES, P.L.L.C.  
*Attorneys for Plaintiffs*